

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	Criminal No.
	)	03-10234-MLW
v.	)	
	)	
JOHN GILLIES,	)	
a/k/a "Robert Burgess," and	)	
a/k/a "David Martino",	)	
BEN SILVER,	)	
a/k/a " Matthew C. Long", and	)	
JOSHUA GOLDSMITH,	)	
	)	
Defendants.		

GOVERNMENT'S MOTION TO FILE  
RESPONSE TO DEFENDANT GOLDSMITH'S  
MOTION TO SUPPRESS OUT OF TIME  
(ASSENTED TO)

The United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves the Court for an additional two week period in which to respond the Motion to Suppress filed by defendant Joshua Goldsmith. The government's response was due on April 22, 2005, and the government requests that the Court extend this time to May 6, 2005.

As grounds for this motion, the government represents that the defendant recently advised the government that he intended to go forward on the motion. At the time the undersigned counsel learned of this, she was (and continues to be) in the midst of preparing for trial in the matter United States v. Manuel Mendes, Criminal No. 04-10098, which is scheduled to begin before Judge Young on May 2, 2004. At the time, counsel for defendant

Goldsmith agreed to an extension.

WHEREFORE, the United States respectfully requests that the Court continue the time it needs to respond to defendant Goldsmith's motion to and including May 6, 2005.

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Susan M. Poswistilo  
SUSAN M. POSWISTILO  
Assistant U.S. Attorney